

2. That the medical treatment sought out and received by Nyamekey Allen following the June 4, 2016 motor vehicle accident was not the result of, or necessitated by, any injury caused by the June 4, 2016 motor vehicle accident.
3. That more specifically, the neck, back, shoulder, and hip symptoms and conditions for which Nyamekey Allen received treatment by Dr. Todd Sacks were not caused by or related to any injury caused by the June 4, 2016 motor vehicle accident.

METHODOLOGY AND BASIS FOR MY OPINION

The methodology and basis for my opinion concerning Mr. Allen are as follows:

- I performed a detailed review of medical records and documents from the following sources and providers:

Allstate Insurance Co., Traveler's Insurance Co., Country Financial Insurance Co., Siegel Insurance Co., Police Accident Report (6/4/16), photos of Mr. Allen's car, Michael Family Chiropractic, Atlanta Medical Institute, Resurgens Orthopedics, Northside Hospital, Wellstar Cobb Hospital and Plaintiff's Responses to Defendant Crete's Interrogatories.

- I used my 35 years of experience as a board certified orthopaedic surgeon evaluating and treating joint problems, including shoulder and hip problems;
- I used my 23 years of teaching residents the evaluation and treatment of joint problems, including medical records review, radiographic image review, and bedside examination of patients; and
- I used my 15 years of continuous records review for the purposes of rating Social Security disability applicants.

My method of evaluation of Mr. Allen's condition is scientifically sound and has been used and recognized by physicians for decades.

EXHIBITS TO BE USED

I may use the medical records of Mr. Allen, anatomical models or diagrams and radiographic images.

QUALIFICATIONS OF WITNESS AND PUBLICATIONS AUTHORED BY WITNESS


I am an orthopaedic surgeon in Atlanta, Georgia. I am board certified in orthopaedic surgery. I am a graduate of the Emory University School of Medicine and completed my residency in orthopaedic surgery at Georgia Baptist Medical Center. My credentials are more fully set forth in my Curriculum Vitae attached hereto as Exhibit "A". My publications are included in my CV.

FEES

My Fee Schedule is attached hereto as Exhibit "B".

OTHER TESTIMONY

I have testified as an expert in other cases. Attached hereto as Exhibit "C" is a list of my prior testimony.


G. LEE CROSS, III, M.D.
Date: Aug 28, 2018

Respectfully submitted this 28th day of August, 2018.

WEBB, ZSCHUNKE, NEARY
& DIKEMAN, LLP

/s/ Marvin D. Dikeman

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CERTIFICATE OF SERVICE

I hereby certify that I have this day electronically filed the within and foregoing pleading (prepared in Times New Roman 14 point font) with the Clerk of Court using the CM/ECF system which will automatically send e-mail notification of such filing to the following attorneys of record:

Mathew K. Titus, Esq.
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This 28th day of August, 2018.

/s/ Marvin D. Dikeman
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